

U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street Yew York 10007 MEMO ENDORSED

By Hand Delivery

Honorable Lawrence M. McKeninOCUMENT

United States District Judge 500 Pearl St., Room 1640

United States District Court New York, NY 10007

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Milanes v. Chertoff, 08 Civ. 2354 (LMM) (KNF)

Dear Judge McKenna:

I am writing on behalf of both parties respectfully to request that the deadline for the taking of depositions in this matter, currently set for June 27, 2008, be extended until July 2, 2008. The parties believe that, in light of the timing of the Government's document productions and other logistical matters, including the availability of witnesses, this extension is necessary to enable the completion of deposition-taking. The parties are in the process of finalizing an agreed deposition schedule pursuant to which depositions would be finished as of July 2, 2008.

Accordingly, the parties respectfully request that the Court enter an order modifying the current schedule so as to permit depositions to be taken through July 2, 2008. This extension would not modify any other deadlines in the case. We thank the Court for its consideration of this request.

C- MN - 6/24/08

Respectfully,

MICHAEL J. GARCIA United States Attorney

By:

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